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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91216907
Party	Defendant Anastasia Beverly Hills, Inc.
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

BENEFIT COSMETICS LLC,

Opposer,

v.

ANASTASIA BEVERLY HILLS, INC.,

Applicant.

Opposition No. 91216907

ANSWER

Applicant Anastasia Beverly Hills, Inc. ("ABH"), by and through its undersigned counsel, responds to Opposer Benefit Cosmetics LLC's ("Opposer") Notice of Opposition as follows:

1. ABH does not have sufficient information to admit or deny the allegations of Paragraph 1.

2. ABH does not have sufficient information to admit or deny the allegations of Paragraph 2.

3. ABH does not have sufficient information to admit or deny the allegations of Paragraph 3.

4. ABH does not have sufficient information to admit or deny the allegations of Paragraph 4.

5. ABH does not have sufficient information to admit or deny the allegations of Paragraph 5.

6. ABH does not have sufficient information to admit or deny the allegations of Paragraph 6.

7. ABH does not have sufficient information to admit or deny the allegations of Paragraph 7.

8. ABH denies the allegations of Paragraph 8.

9. ABH admits the allegations of Paragraph 9.

10. ABH admits the allegations of Paragraph 10.

11. ABH admits the allegations of Paragraph 11.

12. ABH admits the allegations of Paragraph 12.

13. ABH denies the allegations of Paragraph 13.

14. ABH denies the allegations of Paragraph 14.

15. ABH denies the allegations of Paragraph 15.

16. ABH admits the allegations of Paragraph 16.

17. ABH admits that Anastasia Soare owns a majority stake in ABH. ABH denies that Anastasia Soare serves as President. Anastasia Soare serves as Chief Executive Officer.

18. ABH admits the allegations of Paragraph 18.

19. ABH admits the allegations of Paragraph 19.

20. ABH denies the allegations of Paragraph 20.

21. ABH admits that the '552 Patent contains the diagram shown. ABH denies that the diagram shown is an example that the patent claims are highly similar to or the literal equivalent of ABH's mark.

22. ABH denies the allegations of Paragraph 22.

23. ABH admits the allegations of Paragraph 23.

24. ABH admits that Exhibit E contains an excerpt from its website. ABH denies that its advertising materials "tout the utilitarian advantages of the Golden Ratio technique."

25. ABH denies the allegations of Paragraph 25.
26. ABH denies the allegations of Paragraph 26.
27. ABH denies the allegations of Paragraph 27.
28. ABH denies the allegations of Paragraph 28.
29. ABH denies the allegations of Paragraph 29.
30. ABH denies the allegations of Paragraph 30.
31. ABH denies the allegations of Paragraph 31.
32. ABH does not have sufficient information to admit or deny the allegations of Paragraph 32.
33. ABH denies the allegations of Paragraph 33.

WHEREFORE, ABH requests that the instant opposition be dismissed, and registration of its Applications be granted.

Date: July 28, 2014

Respectfully submitted,
GREENBERG TRAURIG, LLP

By:



Jeffrey M. Smith, Esq.
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Attorney for Applicant Anastasia Beverly Hills, Inc.

CERTIFICATE OF ELECTRONIC TRANSMISSION

Date: July 28, 2014

I certify that this Answer is being transmitted electronically to the Trademark Trial and Appeal Board of the United States Patent & Trademark Office, on the date indicated above, through the ESTTA electronic filing system at the web site <http://estta.uspto.gov/>.


Kristen L. Fancher, Esq.

CERTIFICATE OF SERVICE

I certify that on July 28, 2014, I served the foregoing Answer by first-class mail to:

David Donahue
Anna Leipsic
Fross Zelnick Lehrman & Zissu, P.C.
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New York, New York 10017


Kristen L. Fancher, Esq.